UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

Bankruptcy Case No. 13-53846

City of Detroit, Michigan,

Judge Thomas J. Tucker

Debtor.

Chapter 9

STIPULATION FOR EXTENSION OF THE DEADLINE TO RESPOND TO MOTION OF THE DETROIT FIRE FIGHTERS ASSOCIATION, IAFF LOCAL 344 ("DFFA") FOR ENTRY OF AN ORDER ENFORCING THE NOVEMBER 30, 2015 GLOBAL SETTLEMENT BETWEEN THE DFFA AND THE CITY OF DETROIT RESOLVING THAT PORTION OF DFFA CLAIM NO. 2812 RELATED TO THE GRIEVANCE FILED ON BEHALF OF OF FIRE FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA'S REINSTATMENT AND FOR RELATED RELIEF

The City of Detroit, Michigan ("<u>City</u>") and the Detroit Fire Fighters Association ("<u>DFFA</u>"), by their undersigned counsel, hereby stipulate and agree as follows:

- 1. On March 15, 2017, the DFFA filed the Motion for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit Resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola's Reinstatement and for Related Relief ("Motion") [Doc. No. 11811].
- 2. The City is currently required to file its response to the Motion no later than March 29, 2017.

3. The parties have conferred and have agreed to extend the deadline for

the City to file its response to the Motion through and including April 5, 2017.

WHEREFORE, the Parties respectfully request that the Court enter an order

extending the deadline for the City to respond to the Motion through and including

April 5, 2017, in substantially the same form as the proposed order attached as

Exhibit 1.

STIPULATED AND AGREED TO ON MARCH 24, 2017:

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EXHIBIT 1

UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:	Bankruptcy Case No. 13-53846
City of Detroit, Michigan,	Judge Thomas J. Tucker
Debtor.	Chapter 9

ORDER GRANTING STIPULATION FOR EXTENSION OF THE DEADLINE TO RESPOND TO MOTION OF THE DETROIT FIRE FIGHTERS ASSOCIATION, IAFF LOCAL 344 ("DFFA") FOR ENTRY OF AN ORDER ENFORCING THE NOVEMBER 30, 2015 GLOBAL SETTLEMENT BETWEEN THE DFFA AND THE CITY OF DETROIT RESOLVING THAT PORTION OF DFFA CLAIM NO. 2812 RELATED TO THE GRIEVANCE FILED ON BEHALF OF OF FIRE FIGHTER BRADLEY SMOLA AND REQUIRING SMOLA'S REINSTATMENT AND FOR RELATED RELIEF

Upon the Stipulation for Extension of the Deadline to Respond to Motion for Entry of an Order Enforcing the November 30, 2015 Global Settlement Between the DFFA and the City of Detroit Resolving That Portion of DFFA Claim No. 2812 Related to the Grievance Filed on Behalf of Detroit Fire Fighter Bradley Smola and Requiring Smola's Reinstatement and for Related Relief [Doc. No. 11811] ("Motion"); and the Court being otherwise advised in the premises;

IT IS ORDERED THAT the deadline for the City of Detroit to respond to the Motion is hereby extended through and including April 5, 2017.